

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

UNITED STATES of AMERICA,

v.

Case No. 3:14-cr-12 (JRS)

ROBERT F. MCDONNELL  
MAUREEN G. MCDONNELL

**MAUREEN G. MCDONNELL'S MOTION #3  
MOTION FOR CLARIFICATION**

Maureen G. McDonnell, through undersigned counsel, respectfully requests clarification of the conditions on Mrs. McDonnell's bail. Specifically, the defense requests clarification that the prohibition on Mrs. McDonnell having "contact" with "witnesses or representatives of the government," Jan. 24, 2014 Initial App. Tran. at 6, does not apply to family, close friends, and longstanding business associates who might be defense witnesses in the case, but rather applies only to people who are exclusively "witnesses . . . of the government" whom the Government specifically identifies to defense counsel and to "representatives of the government." The grounds for this Motion are set forth in the memorandum accompanying the identically styled motion of Robert F. McDonnell, Dkt. Nos. 31-32. Maureen G. McDonnell hereby adopts that Motion pursuant to Local Criminal Rule 12(B).

Dated: January 28, 2014

Respectfully submitted,

By: /s/ Heather H. Martin

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*Attorneys for Maureen G. McDonnell*

**CERTIFICATE OF SERVICE**

I, Heather H. Martin, am a member of the Bar of this Court. I hereby certify that I caused the foregoing Motion to be filed with the Court's CM/ECF system this 28<sup>th</sup> day of January, 2014, thereby causing it to be served on all registered users.

/s/ Heather H. Martin  
Heather H. Martin (VSB # 65694)  
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